

Department of Environmental Resources

1375 New Hope Street
Norristown, PA 19401
215 270-1943

August 6, 1987

Paul Smith
Brooks Instrument Division
407 W. Vine Street
Hatfield, PA 19440

ORIGINAL
(Red)

Re: Hazardous Waste Inspection
PAD002482628
Inspection of July 28, 1987
Hatfield Borough
Montgomery County

NOTICE OF VIOLATION

Dear Mr. Smith:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

75.262(d) No authorizations from treatment, storage or disposal (TSD) facilities were available at the time of inspection. Generators, before designating a hazardous waste shipment for off-site treatment, storage or disposal should contact the TSD facility and obtain a written authorization indicating that the facility is permitted to accept such waste, is capable, has capacity and is willing to accept the waste.

75.262(j) Copy 3 (from ISD to generator) for the following manifests were not available at the time of inspection: PAB00675211, PAB01619739, PAB01597146, and PAB2674453. During a telephone conversation on July 29, 1987, you indicated that these copies were located. Please submit photocopies of Copy 3 for the four manifests listed above to my attention.

I have enclosed a copy of this Department's Guidelines for Preparedness, Prevention and Contingency (PPC) Plans as well as a copy of the Hazardous Waste Management Regulations. The present emergency response plan should be updated and/or amended to insure that it meets this Department's Regulations found in 75.256(i).

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report

Paul Smith
August 5, 1987
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contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at (215)2701886.

Very truly yours,

CAROL A. QUIGLEY
Waste Management Specialist

cc: C. Gnylliv
N. Rocchetti
Division of Compliance & Monitoring
EPA
Rs 30 (4P2)216.2

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part AORIGINAL
(Red)

Date of inspection July 28, 1987 Time start 9:30 Time finish _____

Name of inspector CAROL A. QUIBLEY

Company, installation name BROOKS INSTRUMENT DIVISION

Location 407 W. VINE STREET HATFIELD PA 19440

County Montgomery Municipality HATFIELD BORO

Identification number PA15002482628

Name of responsible official JOHN GOLOEN

Title Plant Manager

Mailing address 407 W. VINE STREET, HATFIELD PA 19440

Area code and phone no. (215) 362-3500

Name of person interviewed PAUL SMITH

Title MANUFACTURING Eng. Manager

Mailing address (if different from above) Same as above

Area code and phone no. Same as above

1. Current waste handling method:

- a. On-site treatment, storage, disposal
- b. On-site use, reuse, recycle, reclaim
- c. Off-site treatment, storage, disposal
- d. Off-site use, reuse, recycle, reclaim

2. Amount of hazardous waste produced:

- a. 382 kg./mo. - based on 2nd quarter '87
- b. 4800 kg./yr. - based on 1986 amounts

3. Types of hazardous waste produced by Hazardous Waste Number:

F001 F005
F003 D001

4. Are hazardous wastes transported off-site by the generator? Yes No

Generators - Part B

1-NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

COMPLIANCE STATUS			REQUIREMENT	ORIGINAL (Red)	CHAPTER CITATION
2	3	4			75.262
X			Identification number		(c) (1)
X			Hazardous waste shipments offered only to licensed transporters		(c) (4)
			Authorization received from TSD facility for wastes shipped off-site		(d)
X			PA manifest used for intrastate shipments		(e) (1) (i)
X			Disposer state manifest or EPA format manifest used for out-of-state shipments		(e) (1) (ii)
X			Manifests filled out properly and completely		(e) (1) (iii)
	X		Manifests routed properly		(e) (2)
	X		Proper U.S. DOT shipping containers or packages		(f) (1) (i)
	X		Shipping containers marked and labeled according to U.S. DOT		(f) (1) (ii)
X			Containers of 100 gal. or less marked with required PA label		(f) (1) (iii)
	X		Placards offered to transporter		(f) (2)
X			Wastes accumulated on-site for less than 90 days		(g) (1)
X			Wastes stored in proper containers and properly marked and labeled		(g) (1) (i)
X			Containers managed in accordance with 75.265(g)		(g) (1) (ii)
X			Containers clearly marked with accumulation date and visible for inspection		(g) (1) (iii)
	X		Records retained at designated location for 20 years		(h)
X			Quarterly reports submitted to the Department		(i)
	X		Exception reporting procedures followed		(j)
	X		Hazardous waste disposal plan, if required		(l)
	X		Spill reporting procedures followed		(m) (1)
X	X		Preparedness, Prevention and Contingency Plan approved and implemented		(m) (5)
	X		Special requirements followed for international shipments		(o)
	X		Training program		
	X		Tanks		
	X		Hazardous waste determination		

Date of Inspection July 28, 1987 Identification Number PA000248262
Company, Installation Name Brooks Instruments
County Montgomery Municipality HATFIELD BORO

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(Red)

Permission to inspect was granted by PAUL SMITH

Written AUTHORIZATIONS from treatment, storage or disposal facilities must be obtained indicating that the facility is permitted to accept such waste, is capable, has capacity & is willing to accept each waste stream.

Copy 3 (from TSO to Generator) for the following manifests were not available

PAB00676211

PAB01619730

PAB01697146

PAB2674453

All manifested shipments went to RTS (Resource Technology Services) in Conshohocken, PA

A copy of the PPC guidelines will be sent to you so that your emergency response plan can be updated

- send copy of regulations also

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Paul M. Smith

Date 7/28/87

Inspector (signature) Carol A. Quefley

Date 7/28/87

Department of Environmental Resources

1875 New Hope Street
 Norristown, PA 19401
 215 270-1920

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 ORIGINAL
 (Red)

May 24, 1984

Mr. Paul Smith, Manager
 Manufacturing Engineering
 Brooks Instrument Division
 407 West Vine Street
 Norristown, PA 19401

JUN 5 1984
 DIV. OF HAZARDOUS WASTE

Re: Hazardous Waste Inspection
 PAHX02482628, March 27, 1984

NOTICE OF VIOLATION

Dear Mr. Smith:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

1. Waste containers not marked with hazardous waste labels and accumulation start dates as per Section 262(p).
2. Quarterly reports not submitted for wastes shipped off site as per Section 262(j).

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law existing prior to or after the issuance of this letter or the date of the cited violation. This letter shall not be construed as an attempt to deprive any rights of the Department of Environmental Resources, past, present, or hereafter existing.

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Mr. Paul Smith, Manager
May 24, 1984
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This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at 270-1920.

Very truly yours,

PAUL SMITH
Solid Waste Specialist

cc: W. James B.
B. Keithler
Division of Hazardous Waste ✓
CR 30 0155

RECEIVED
JUN 5 1984